



**Minden Exchange  
Bank & Trust Co.**

(D. J. Darr)  
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D. J. Darr

September 21, 2005

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FDIC – San Francisco Regional Office  
Director John F. Carter  
25 Jesse Street at Ecker Square, Suite 2300  
San Francisco, CA 94105

RE: Wal-Mart Application for FDIC Insurance

Dear Mr. Carter:

Please allow me to introduce myself. I am a Board of Director of the Nebraska Bankers Association and Senior Vice President of the Minden Exchange Bank & Trust Company of Minden, Nebraska. I would ask that you accept my letter of opposition to the Wal-Mart application for FDIC insurance for its industrial loan company in Utah.

As you know, the banking industry nationwide has traditionally opposed the mixing of banking and commerce. Congress stated its opposition to the mixing of banking and commerce when it enacted the Gramm-Leach-Bliley Act. Mixing banking and commerce represents bad public policy that could jeopardize the impartial allocation of credit and create conflicts of interest. The Wal-Mart application in Utah does not seek broad "banking" powers now, however; once a charter is granted, expanded powers including nationwide branching could be sought. The vast resources brought to the table by Wal-Mart would have an adverse impact on community banks, in much the same manner that Wal-Mart's presence has had on other retail establishments in the communities in which it has located.

Consider the number of entities which currently have the ability to provide banking like products and services. A nationwide banking operation by Wal-Mart would pose a significant systemic risk given the vast numbers which they represent. The potential size of Wal-Mart's banking operation would represent an ill-advised and unprecedented concentration of economic power.

Thank you for your consideration in this matter.

Sincerely,

Arlen J. Osterbuhr  
Sr. Vice President